

The Honorable Christopher M. Alston  
Chapter 11  
Hearing Date: Wednesday, June 13, 2018  
Hearing Time: 9:30 am  
Hearing Location: Seattle, Rm. 7206  
Response Date: June 6, 2018

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re  
**NORTHWEST TERRITORIAL MINT, LLC,**  
Debtor.

No. 16-11767-CMA

STATEMENT IN RESPONSE TO  
TRUSTEE'S REPLY IN SUPPORT OF  
MOTION FOR ORDER APPROVING  
THE SALE OF CERTAIN ASSETS OF  
THE ESTATE FREE AND CLEAR OF  
LIENS, CLAIMS, INTERESTS, AND  
ENCUMBERANCES TO AMERICAN  
NUMISMATIC SOCIETY

Comes now, American Numismatic Association, Dick Johnson, Friedrike Merck, Daniel Altshuler, Don Everhart, Gould Studios, Don Wiegand and the Wiegand Foundation New York Numismatic Club, Karen Worth, Manship Artists Residency, Bob Palmisano, the heirs of Berthold Nebel, the Heirs of Marcel Jovine, the Heirs of Walker Hancock, and the National Sculpture Society (collectively the “Interested Parties”), Interested Parties in the above-reference matter, by and through their attorneys, Michelle Carmody Kaplan, of Kaplan Law PLLC, and John E. Kennedy, of Morley Thomas Law, and hereby submit this Statement in Response to the Truste’s Reply in Support of Motion for Order Approving the Sale of

**Interested Parties Statement  
Re: Trustee's Reply – ANS Sale - 1**

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1 Certain Assets of the Estate Free and Clear of Liens, Interests, and Encumberances to  
2 American Numismatic Society. [ECF No. 1706].

3       1. The Interested Parties do not object to the sale of the pre-1998 MACO dies to  
4 the American Numismatic Society pursuant to the Trustee's Motion for Order Approving the  
5 Sale of Certain Assets of the Estate Free and Clear of Liens, Interests, and Encumberances to  
6 American Numismatic Society (the "ANS Sale Motion") [ECF No. 1676].

7       2. Prior to the filing of the ANS Sale Motion, Mr. Kennedy and the undersigned  
8 worked with Aimee Willig, counsel for the American Numismatic Society, and the Trustee's  
9 counsel, to generate a mutually agreeable form of order. That order was to have been filed  
10 with the Court as the proposed order in connection with the Sale Motion. The agreed order is  
11 now filed by the Trustee today.

12       3. As to the sale of assets to American Numismatic Society, the Interested Parties  
13 have none of the concerns raised previously in this case with respect to potential purchasers of  
14 assets. To the contrary, the Interested Parties seek to have assets in the hands of ANS as a  
15 wholly trusted organization founded upon a mission of historical preservation and education.

16       4. In fact, the following language setting forth ANS's history and purpose was  
17 proposed by Mr. Kennedy in connection with the drafting of an agreed order:

19               The Court recognizes that the *American Numismatic Society* is a not-  
20 for-profit organization dedicated to the study of coins, currency, medals,  
21 tokens, and related objects from all cultures, past and present. The ANS has  
22 the foremost research collection and library specialized in numismatics in  
23 the United States whose resources are used to support research and  
24 education in numismatics, for the benefit of academic specialists, serious  
25 collectors, professional numismatists, and the interested public. The  
26 remaining assets of the Medallic Art Company, which include pre-1998  
coining dies, sample strikes, galvanos and other miscellaneous and  
associated work have substantial historical and educational value consistent  
with the ANS' mission to support research and education in the  
Numismatic field. The ANS represents that its ownership and use of the  
MACO assets will remain consistent with its mission of education and  
historical preservation in the Numismatic Field.

Interested Parties Statement  
Re: Trustee's Reply – ANS Sale - 2

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1           *The Court recognizes that the ANS APA is based on the educational  
2 and historical value of the MACO assets and not for purposes of economic  
3 advantage. While nothing in this Order authorizes the transfer of any  
4 copyright or other intellectual property, the ANS may make use of the  
5 purchased assets consistent with its core mission of historical preservation  
6 and education in the Numismatic field.*

7  
8           DATED this 11<sup>th</sup> day of June 2018.

9  
10          **KAPLAN LAW PLLC**

11          **MORLEY THOMAS LAW**

12          By /s/ Michelle Carmody Kaplan  
13          Michelle Carmody Kaplan  
14          WSBA No. 27286  
15          Attorney for Interested Parties

16          By /s/ John E. Kennedy  
17          John E. Kennedy  
18          Pro Hac Vice OSB 98/2697  
19          Attorney for Interested Parties

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Interested Parties Statement  
Re: Trustee's Reply – ANS Sale - 3

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